

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

SINGULAR COMPUTING LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

C.A. No. 1:19-cv-12551-FDS

Hon. F. Dennis Saylor IV

**DEFENDANT GOOGLE LLC'S RESPONSE TO PLAINTIFF SINGULAR'S
REQUEST FOR STATUS CONFERENCE**

In anticipation of the July 6, 2023 status conference (Dkt. No. 540), Defendant Google LLC respectfully submits this brief response to Singular's request for a status conference (Dkt. No. 539). At the recent hearing on the parties' pending motions for summary judgment and to strike certain expert testimony, the Court indicated that it may rule on certain of those motions at or before the upcoming July 18, 2023 status conference. Setting pretrial disclosures is thus premature as the Court's rulings on the pending motions will clarify the scope of this case going forward and thus what pretrial disclosures (if any) the parties should submit.

However, should the Court wish to set a schedule for pretrial disclosures before the upcoming July 18, 2023 status conference, then subject to Google's pending motion to continue the trial (Dkt. No. 453), Google respectfully requests that the Court adopt Google's proposed schedule below. Unlike Singular's proposed schedule, Google's proposed schedule would give the parties time to account for any rulings the Court issues on July 18, 2023, and thus Google's proposed schedule will save the parties from spending time and effort on issues that the Court's rulings may moot.

Event	Singular Proposed Deadline	Google Proposed Deadline
Exchange Deposition Designations, Discovery Designations, and Exhibit Lists	7/12/2023	8/3/2023 (Exhibit List Only)
Exchange Witness Lists	7/19/2023	8/3/2023
Exchange Deposition & Discovery Designations	<i>See above</i>	8/9/2023
Exchange proposed jury instructions / voir dire / jury questionnaire / verdict forms	7/19/2023	8/8/2023 (Jury Instructions Only)
Objections to Exhibit Lists	7/26/2023	8/10/2023
Exchange jury questionnaire / voir dire / verdict forms	<i>See above</i>	8/11/2023
Exchange objections to proposed jury instructions / voir dire / verdict forms	8/2/2023	8/15/2023 (Jury Instructions Only)
Exchange counters and objections to deposition designations and objections to discovery designations	8/3/2023	8/16/2023
Reply to Exhibit Lists	8/2/2023	8/17/2023
Exchange objections to jury questionnaire / voir dire / verdict forms	<i>See above</i>	8/18/2023
File MILs	8/17/2023	
Pretrial Memo	8/17/2023	8/24/2023
File MIL Oppositions	8/24/2023	
Final Pretrial Conference	9/5/2023	8/31/2023 or at the Court's convenience
Trial Date	9/11/2023	9/11/2023

Respectfully submitted,

Dated: July 5, 2023

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CERTIFICATE OF SERVICE

I certify that this document is being filed through the Court's electronic filing system, which serves counsel for other parties who are registered participants as identified on the Notice of Electronic Filing (NEF). Any counsel for other parties who are not registered participants are being served by first class mail on the date of electronic filing.

/s/ Nathan R. Speed

Nathan R. Speed